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APR 19 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

April 19, 2000

EX PARTE

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

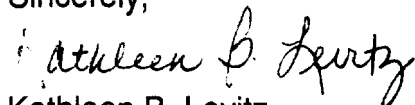
Re: CC Docket No. 98-56 and CC Docket No. 98-121

Dear Ms. Salas:

On April 18, 2000, Bill Stacy, Jonathan Banks and I, representing BellSouth, met with Jake Jennings and Jessica Rosenworcel of the Common Carrier Bureau's Policy and Program Planning Division. During this meeting, we discussed what in the context of a 271 application would be evidence sufficient to demonstrate that BellSouth was in compliance with obligations related to provision of DSL loops and line sharing imposed in the *Third Report and Order* in CC Docket No. 96-98 and the *Third Report and Order* in CC Docket No. 98-147. The attached document formed the basis for that discussion.

In accordance with Section 1.1206, I am filing two copies of this notice in both of the proceedings identified above. Please place this notice in the records of both.

Sincerely,



Kathleen B. Levitz

Attachment

cc: Jake Jennings (w/o attachment)
Jessica Rosenworcel (w/o attachment)

Analysis of DSL Services & UNE's provided by BellSouth

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- BellSouth provides DSL services to NSP's and CLEC's via 3 options (with a number of sub-categories in these options)
 - These options are:
 - Wholesale ADSL service
 - Unbundled XDSL loops
 - Line Sharing

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- The Sub categories for these options are:

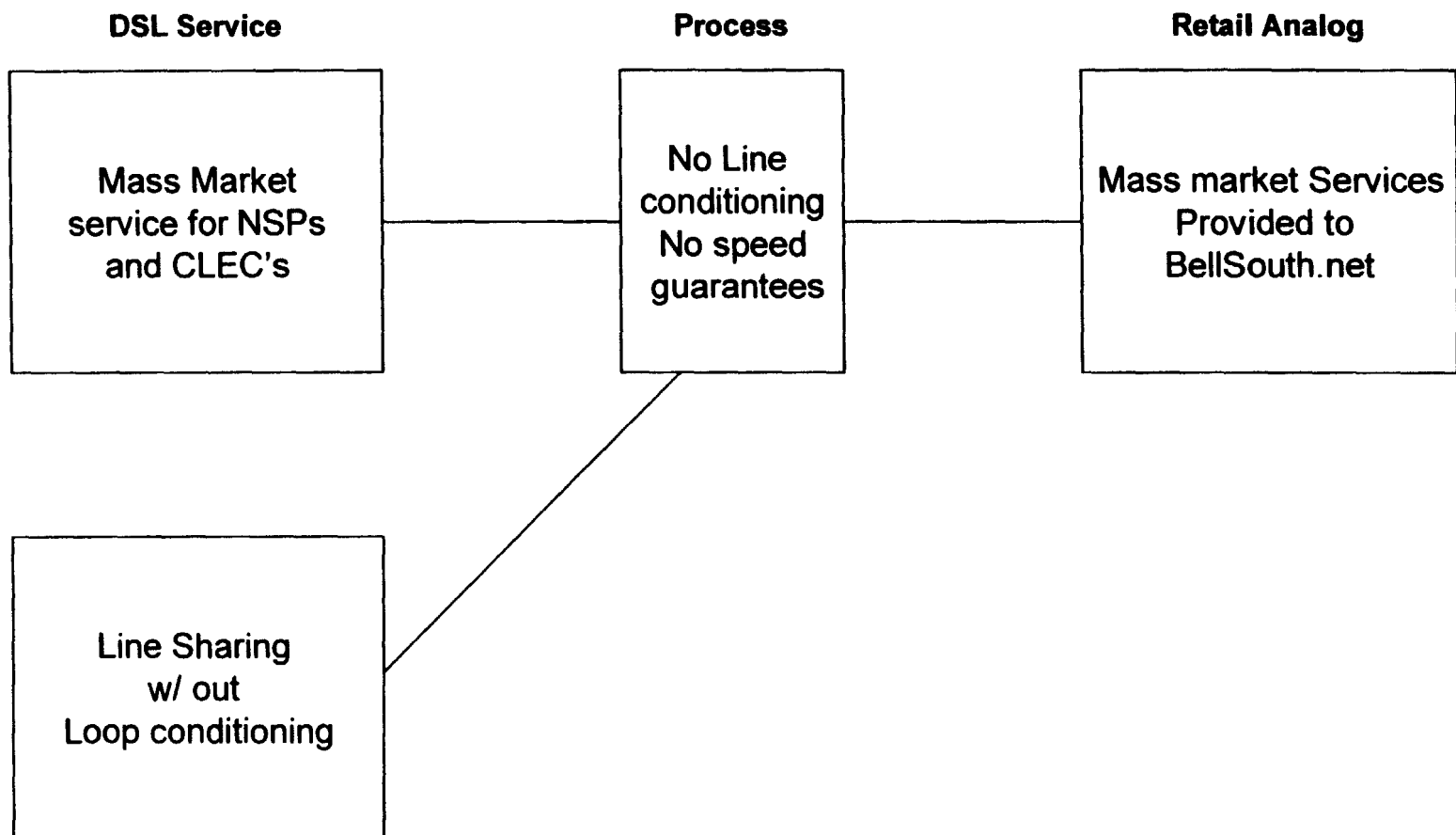
Wholesale ADSL Services
Mass Market Services (Dispatch) (Non-Dispatch)
Business Class Services

Unbundled XDSL Loops
ADSL Loops
UCL Loops
HDSL Loops
ISDN Loops

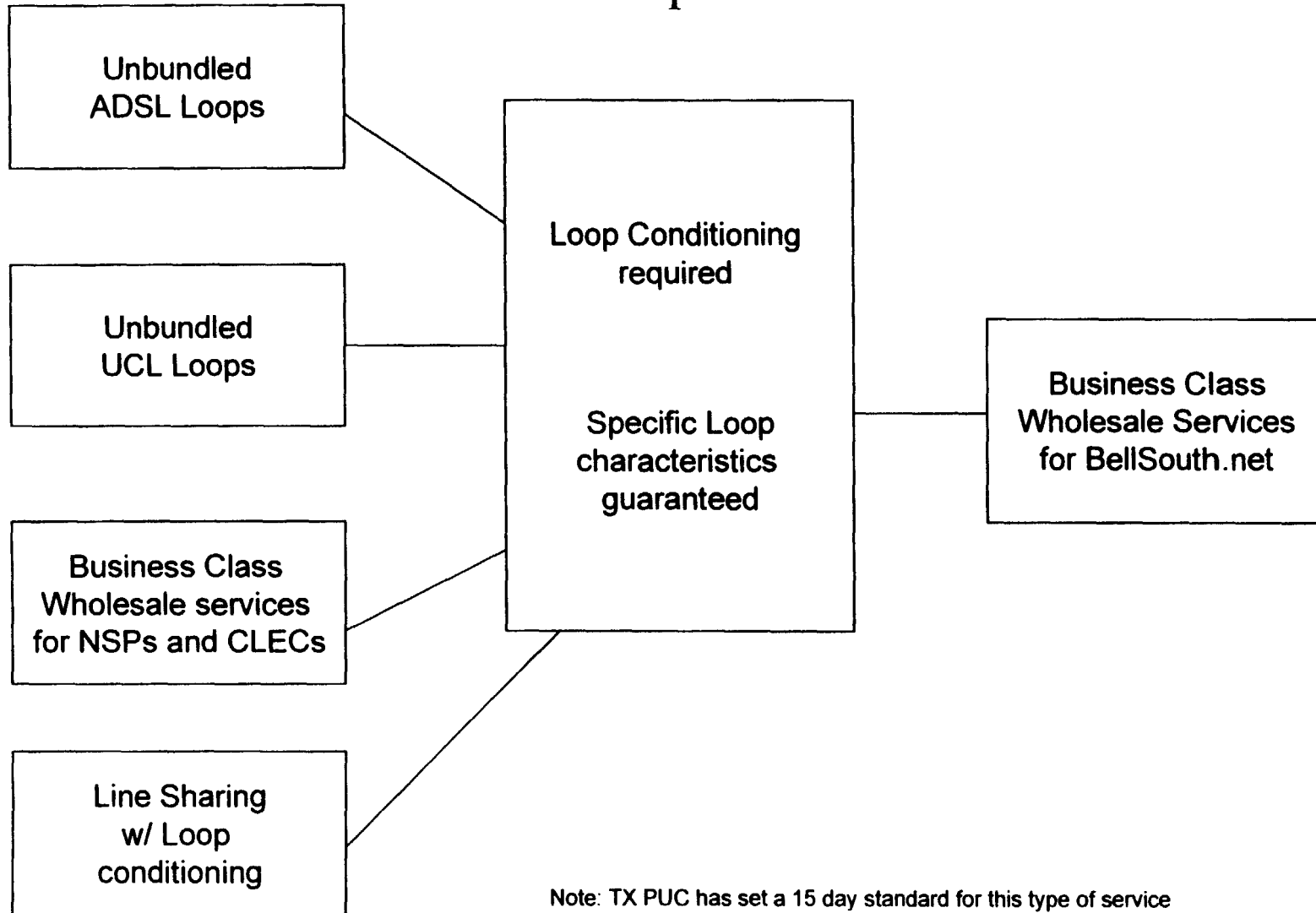
Line Sharing
Without Loop Conditioning
With Loop Conditioning

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- **Determination of parity for these services requires analysis of the processes used to provide the services to insure appropriate retail analogs or surrogate analogs are selected**
 - **Based on the processes involved, the appropriate retail analogs and surrogates are:**

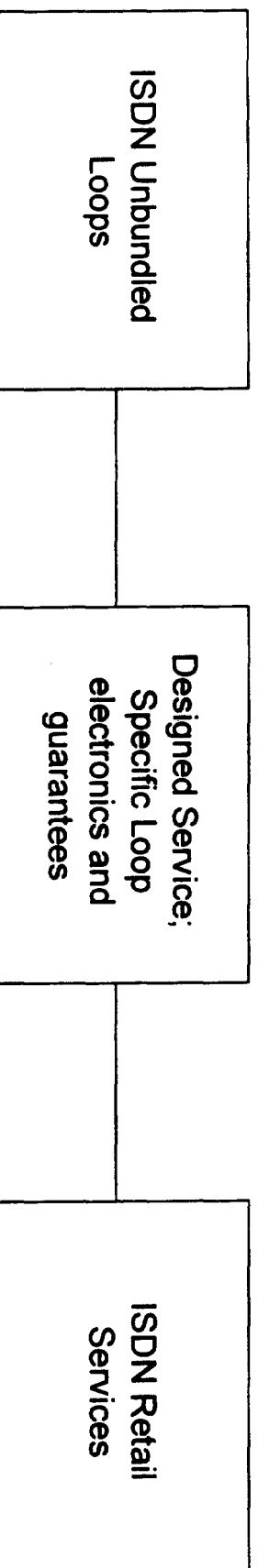
Group I



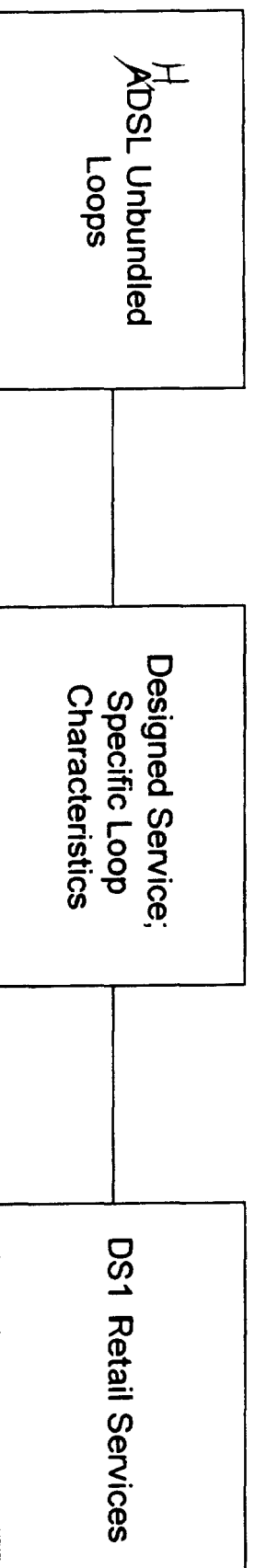
Group II



Group III



Group IV



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- We have completed analysis of November 1999 - February 2000 data for the categories for order completion intervals
 - This analysis indicated:

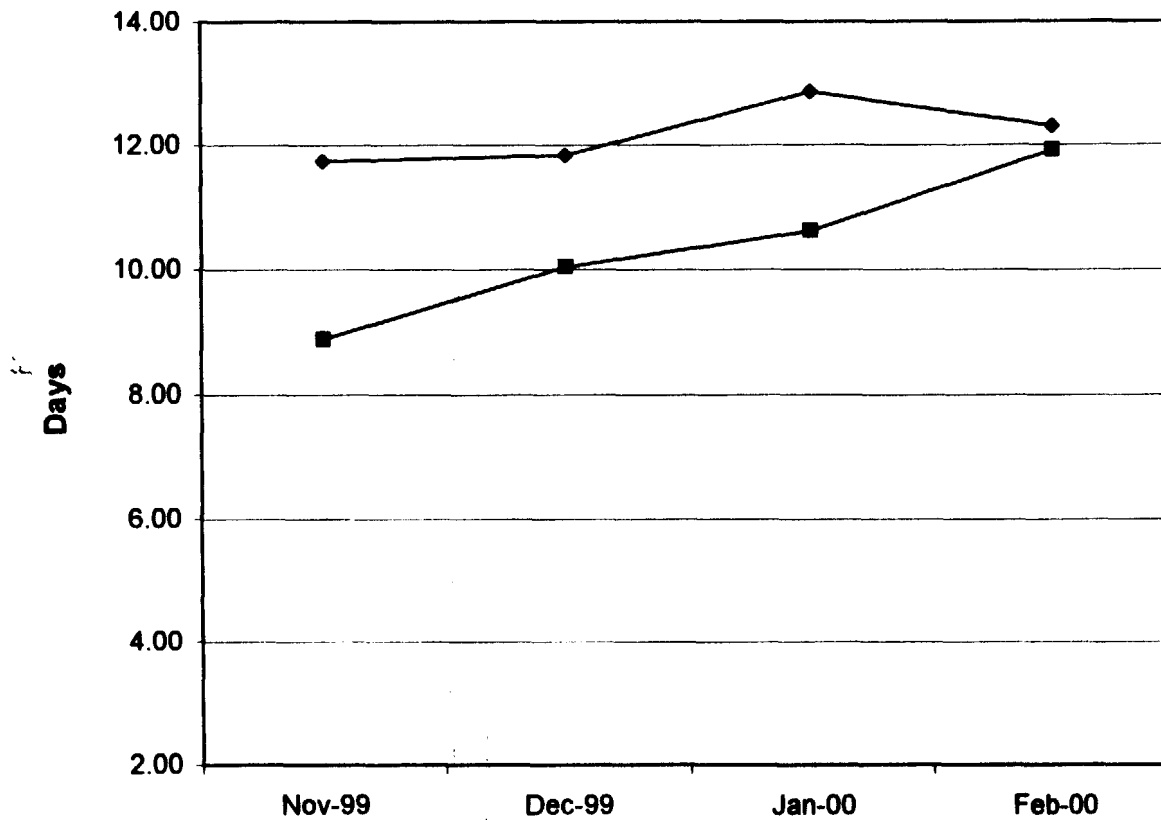
Volumes of both wholesale services and XDSL unbundled loops services continue to increase

		NOV	DEC	JAN	FEB
Georgia	Wholesale Services (Group I)	1205	2327	2493	2602
	XDSL Unbundled Loops (Group2)	141	146	135	214

		NOV	DEC	JAN	FEB
Region	Wholesale Services (Group I)	6461	10518	9521	9541
	XDSL Unbundled Loops (Group2)	374	463	587	409

-
- BellSouth is providing parity of OCI between services provided to CLECs and services provided to BellSouth.net. When CLEC services are compared to the connect retail analog or external standard (Charts 1 & 2)
 - In cases where there is limited data for direct comparison (Groups 2,3,4); the data clearly indicates that BellSouth is
 - ☐ Providing order completion intervals that meet external the standards created by the Texas PUC
 - ☐ Even when XDSL unbundled loops provisioning is compared to BellSouth wholesale (dispatch) mass market ADSL service offering, the OCI is substantially similar

Group I, Dispatch



◆ NSP WHOLESALE
MASS MARKET
(DOT.NET + GLEC
DOT.NET)

■ NSP WHOLESALE
(DOT.NET + CLEC
DOT.NET)

	Nov-99	Dec-99	Jan-00	Feb-00
◆ NSP WHOLESALE MASS MARKET (DOT.NET + GLEC DOT.NET)	11.74	11.84	12.86	12.30
■ NSP WHOLESALE (DOT.NET + CLEC DOT.NET)	8.89	10.04	10.62	11.92

CHART 1

Group I, Non - Dispatch

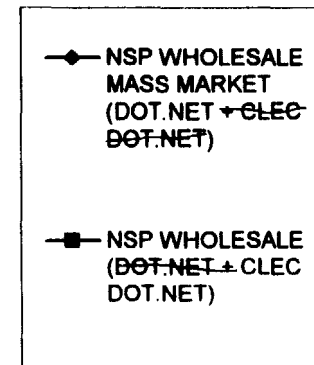
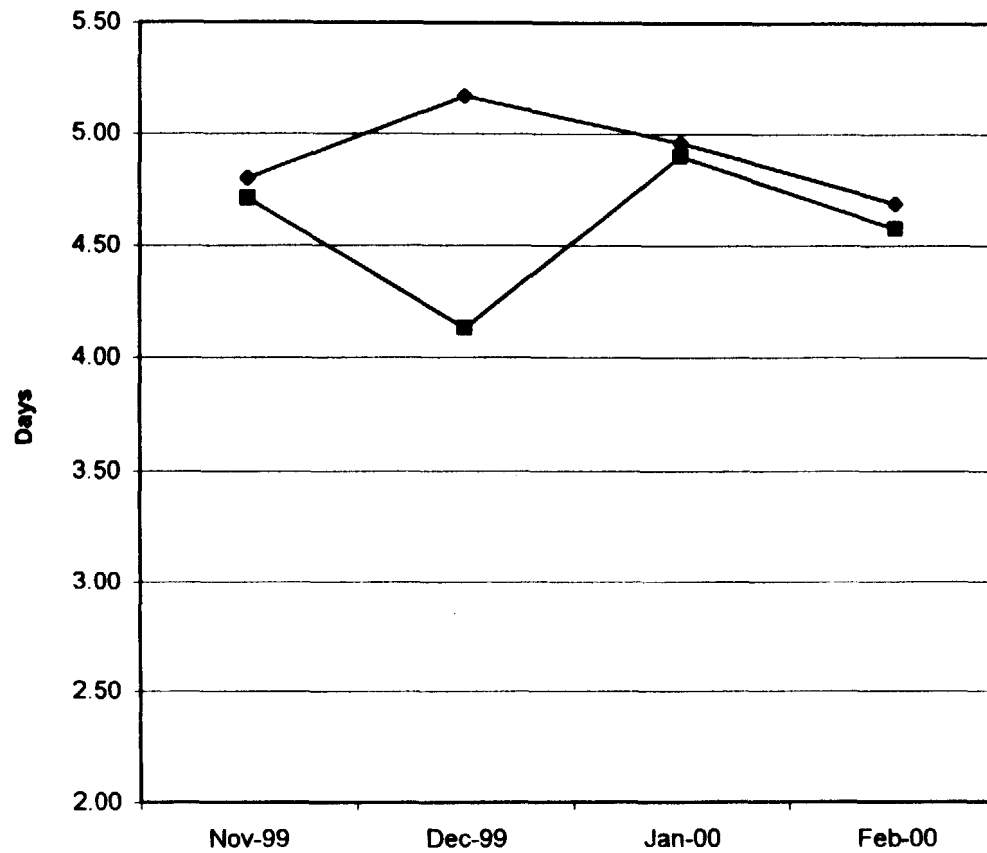
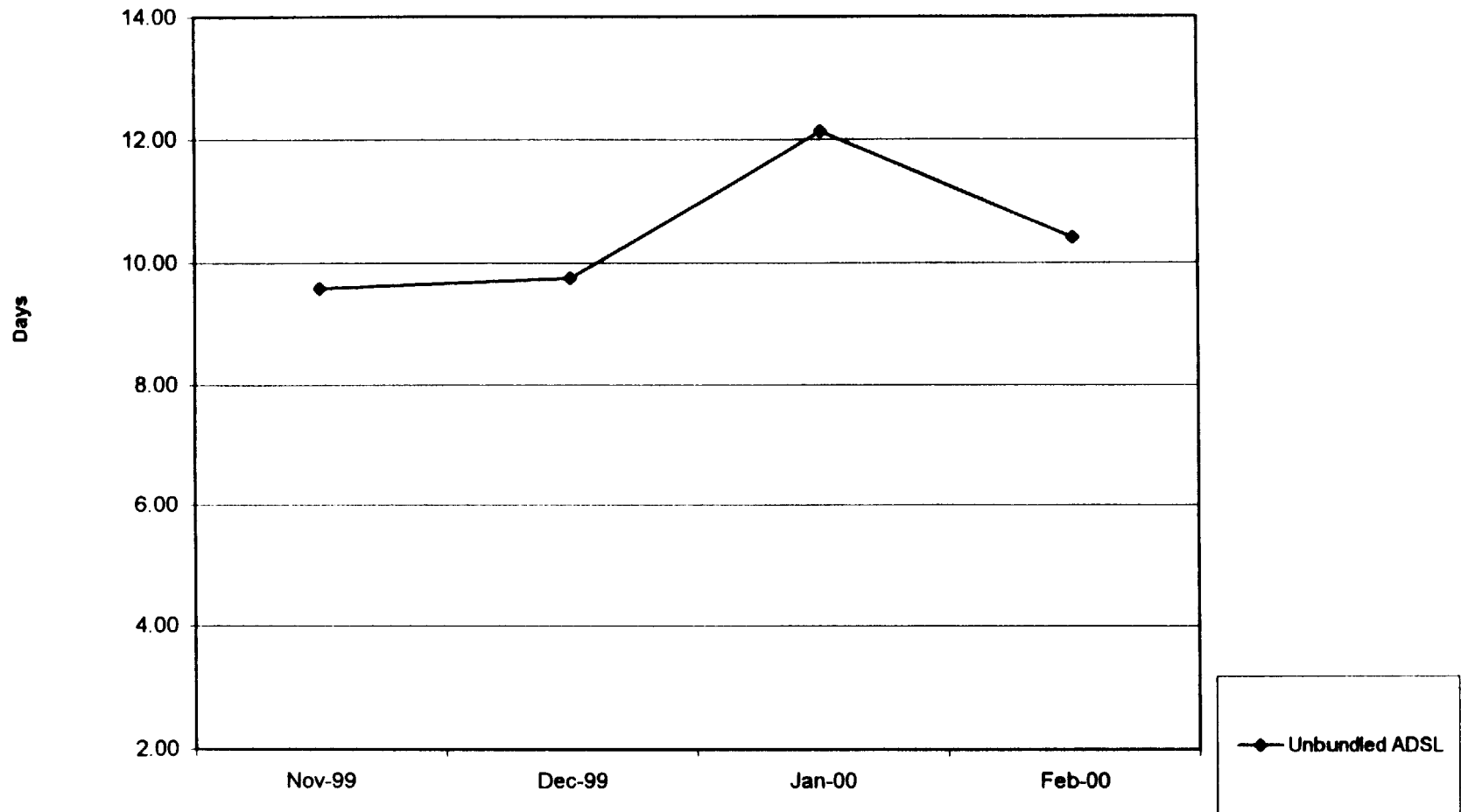


CHART 2

	Nov-99	Dec-99	Jan-00	Feb-00
◆ NSP WHOLESALE MASS MARKET (DOT.NET + CLEC DOT.NET)	4.80	5.17	4.96	4.69
■ NSP WHOLESALE (DOT.NET + CLEC DOT.NET)	4.71	4.13	4.90	4.58

Unbundled ADSL, Group 2
Dispatch (7)



—◆— Unbundled ADSL

CHART 3

Unbundled HDSL
Dispatch (8)

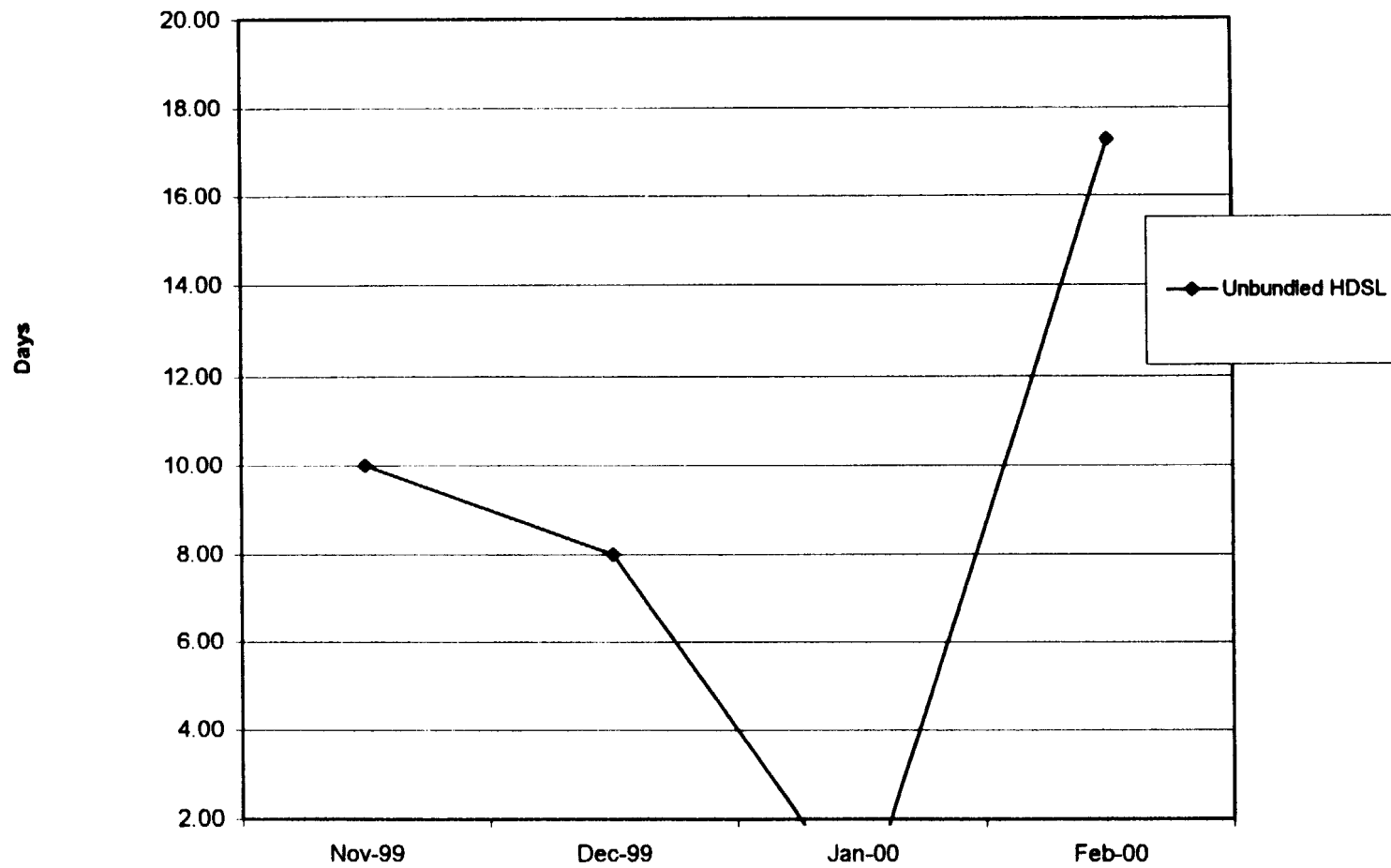


CHART 4

	Nov-99	Dec-99	Jan-00	Feb-00
◆ Unbundled HDSL	10.00	8.00	0.00	17.28

Unbundled ISDN vs ISDN Retail
Dipatch (9 vs 10)

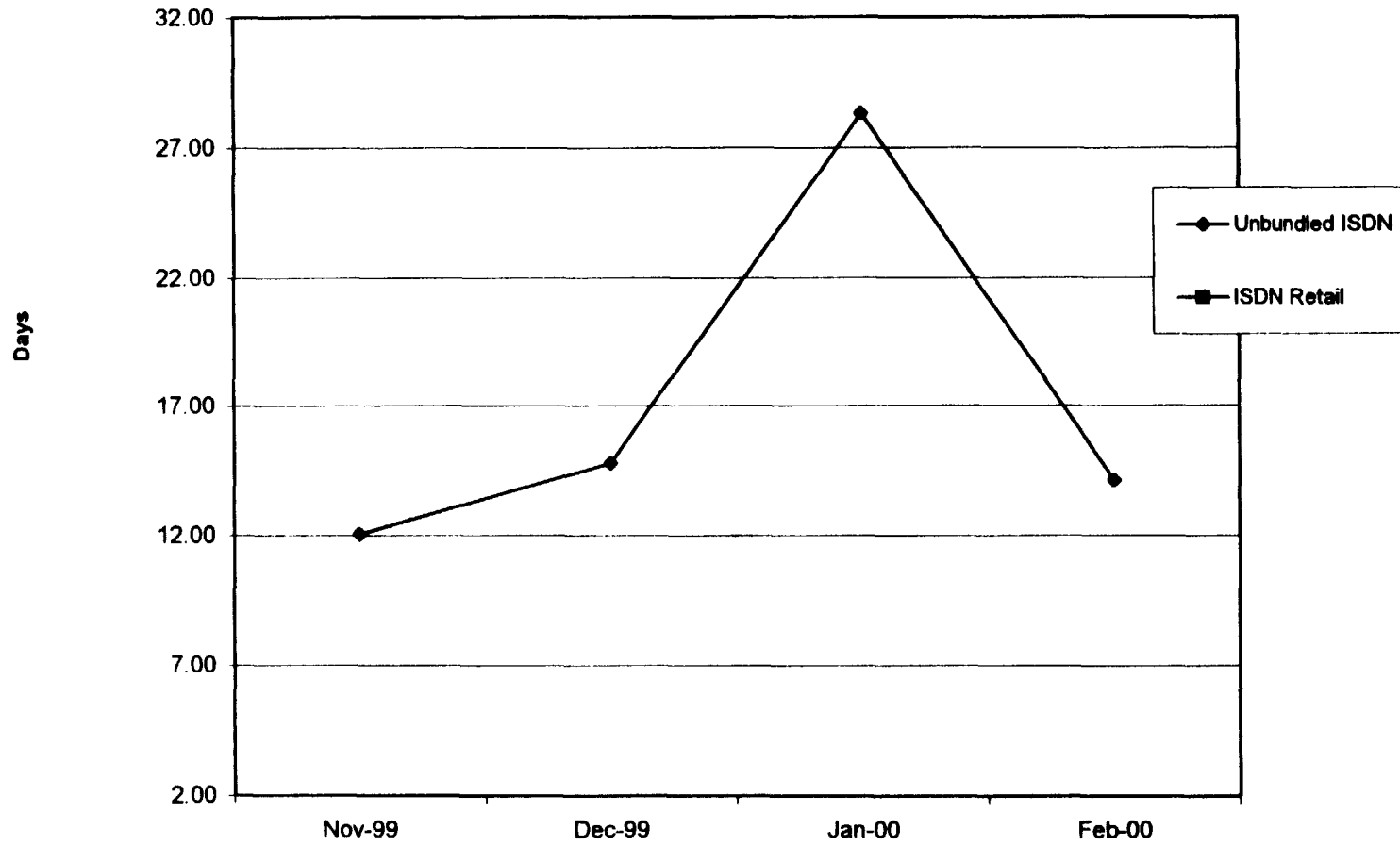


CHART 5

	Nov-99	Dec-99	Jan-00	Feb-00
◆ Unbundled ISDN	12.05	14.77	28.31	14.13
■ ISDN Retail	0.00	0.00	0.00	0.00

Unbundled Copper Loop
Dispatch (12)

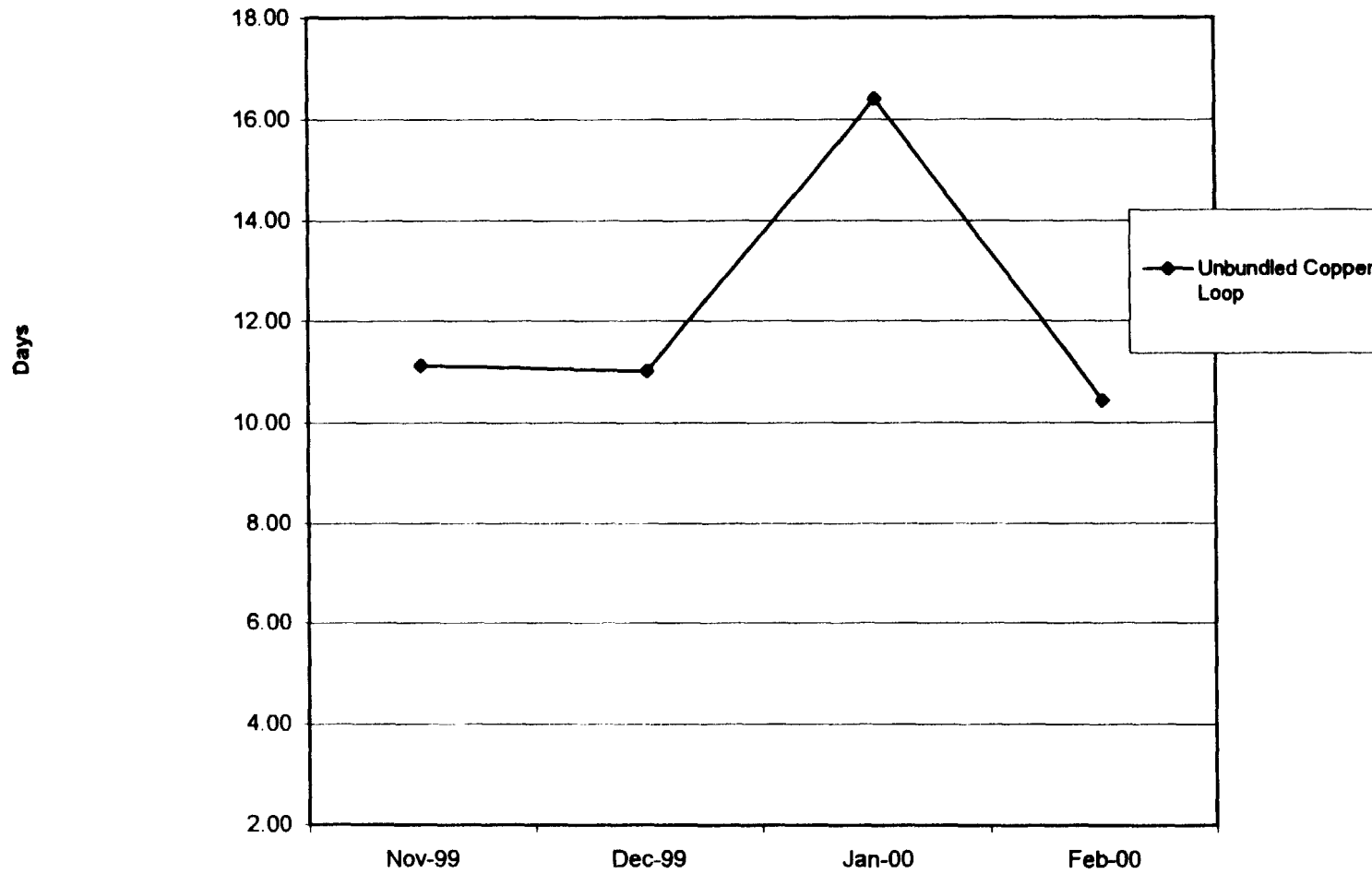


CHART 6

	Nov-99	Dec-99	Jan-00	Feb-00
Unbundled Copper Loop	11.12	11.01	16.39	10.44

Comparison of Retail, Resale and UNE xDSL Activity											
By State, By MSA, by Product											
With Interval Distribution & Average Interval & Count											
(Retail for Business Class ADSL Only - Guaranteed Transmission Levels)											
November 1999											
Excludes those orders where (original_due_date - application_date) is greater than the offered date											
Dispatch											
State	Service	Interval								Total	AVG INTVL(DAY)
		0-5	6-10	11-15	16-20	21-25	26-30	31-59	60+		
Georgia	1 NSP Wholesale Mass Market(DOT.NET)	49	193	50	16	10	7	12	8	343	11.74
	2 NSP Wholesale Mass Market-CLEC(DOT.NET)	0	0	0	0	0	0	0	0	0	0
	3 NSP Wholesale Business(DOT.NET)	0	0	0	0	0	0	0	0	0	0
	4 NSP Wholesale Business-CLEC(DOT.NET)	0	0	0	0	0	0	0	0	0	0
	5 NSP Wholesale(NOT DOT.NET)	9	209	28	9	2	1	4	0	262	8.91
	6 NSP Wholesale-CLEC(NOT DOT.NET)	1	0	0	0	0	0	0	0	1	3
	7 Unbundled ADSL	3	11	9	0	1	0	0	0	24	9.58
	8 Unbundled HDSL	0	7	4	0	0	0	0	0	11	10
	9 Unbundled ISDN	0	15	2	3	0	0	2	0	22	12.05
	10 ISDN Retail	0	0	0	0	0	0	0	0	0	0
	11 ISDN Resale	0	0	0	0	0	0	0	0	0	0
	12 Unbundled Copper Loop	2	53	15	7	3	1	3	0	84	11.12
Dispatch											
State	Service	Interval								Total	AVG INTVL(DAY)
		0-5	6-10	11-15	16-20	21-25	26-30	31-59	60+		
Georgia	1+2 NSP WHOLESALE MASS MARKET (DOT.NET + CLEC DOT.NET)	49	193	50	16	10	7	12	8	343	11.74
	5+6 NSP WHOLESALE (DOT.NET + CLEC DOT.NET)	10	209	28	9	2	1	4	0	263	8.89
	7 Unbundled ADSL	3	11	9	0	1	0	0	0	24	9.58
	8 Unbundled HDSL	0	7	4	0	0	0	0	0	11	10
	9 Unbundled ISDN	0	15	2	3	0	0	2	0	22	12.05
	10 ISDN Retail	0	0	0	0	0	0	0	0	0	0
	12 Unbundled Copper Loop	2	53	15	7	3	1	3	0	84	11.12

TABLE 1

Comparison of Retail, Resale and UNE xDSL Activity											
By State, By MSA, by Product											
With Interval Distribution & Average Interval & Count											
(Retail for Business Class ADSL Only - Guaranteed Transmission Levels)											
December 1999											
Excludes those orders where (original_due_date - application_date) is greater than the offered date											
Dispatch State	Service	Interval								Total	AVG INTVL(DAY)
		0-5	6-10	11-15	16-20	21-25	26-30	31-59	60+		
Georgia	1 NSP Wholesale Mass Market(DOT.NET)	43	354	108	53	39	18	18	5	632	11.84
	2 NSP Wholesale Mass Market-CLEC(DOT.NET)	0	0	0	0	0	0	0	0	0	0
	3 NSP Wholesale Business(DOT.NET)	0	0	0	0	0	0	0	0	0	0
	4 NSP Wholesale Business-CLEC(DOT.NET)	0	1	0	0	0	0	0	0	1	7
	5 NSP Wholesale(NOT DOT.NET)	34	492	77	28	18	13	12	2	674	10.08
	6 NSP Wholesale-CLEC(NOT DOT.NET)	0	4	0	0	0	0	0	0	4	7
	7 Unbundled ADSL	1	24	5	0	0	1	1	0	32	9.75
	8 Unbundled HDSL	1	3	2	0	0	0	0	0	6	8
	9 Unbundled ISDN	0	8	3	1	0	0	0	1	13	14.77
	10 ISDN Retail	0	0	0	0	0	0	0	0	0	0
	11 ISDN Resale	0	0	0	0	0	0	1	0	1	58
	12 Unbundled Copper Loop	5	61	17	4	1	2	4	0	94	11.01
Dispatch State	Service	Interval								Total	AVG INTVL(DAY)
		0-5	6-10	11-15	16-20	21-25	26-30	31-59	60+		
Georgia	1+2 NSP WHOLESALE MASS MARKET (DOT.NET + CLEC DOT.NET)	43	354	108	53	39	18	18	5	632	11.84
	5+6 NSP WHOLESALE (DOT.NET + CLEC DOT.NET)	34	496	77	28	18	13	12	2	678	10.04
	7 Unbundled ADSL	1	24	5	0	0	1	1	0	32	9.75
	8 Unbundled HDSL	1	3	2	0	0	0	0	0	6	8
	9 Unbundled ISDN	0	8	3	1	0	0	0	1	13	14.77
	10 ISDN Retail	0	0	0	0	0	0	0	0	0	0
	12 Unbundled Copper Loop	5	61	17	4	1	2	4	0	94	11.01

Comparison of Retail, Resale and UNE xDSL Activity											
By State, By MSA, by Product											
With Interval Distribution & Average Interval & Count											
(Retail for Business Class ADSL Only - Guaranteed Transmission Levels)											
January 2000											
Excludes those orders where (original_due_date - application_date) is greater than the offered date											
Dispatch	Interval										
State	Service	0-5	6-10	11-15	16-20	21-25	26-30	31-50	60+	Total	AVG INTVL(DAY)
Georgia	1 NSP Wholesale Mass Market(DOT.NET)	58	441	109	70	44	27	41	7	797	12.86
	2 NSP Wholesale Mass Market-CLEC(DOT.NET)	0	0	0	0	0	0	0	0	0	0
	3 NSP Wholesale Business(DOT.NET)	0	0	0	0	0	0	0	0	0	0
	4 NSP Wholesale Business-CLEC(DOT.NET)	0	0	0	0	0	0	0	0	0	0
	5 NSP Wholesale(NOT DOT.NET)	30	750	91	36	33	10	31	7	968	10.6
	6 NSP Wholesale-CLEC(NOT DOT.NET)	0	5	2	0	1	1	0	0	9	12.56
	7 Unbundled ADSL	0	36	10	3	0	1	4	0	54	12.13
	8 Unbundled HDSL	0	0	0	0	0	0	0	0	0	0
	9 Unbundled ISDN	2	3	0	0	2	1	3	2	13	28.31
	10 ISDN Retail	0	0	0	0	0	0	0	0	0	0
	11 ISDN Resale	0	0	0	0	0	0	0	0	0	0
	12 Unbundled Copper Loop	2	36	9	1	5	1	8	2	67	16.39
Dispatch	Interval										
State	Service	0-5	6-10	11-15	16-20	21-25	26-30	31-50	60+	Total	AVG INTVL(DAY)
Georgia	1+2 NSP WHOLESALE MASS MARKET (DOT.NET + CLEC DOT.NET)	58	441	109	70	44	27	41	7	797	12.86
	5+6 NSP WHOLESALE (DOT.NET + CLEC DOT.NET)	30	755	93	36	34	11	31	7	997	10.62
	7 Unbundled ADSL	0	36	10	3	0	1	4	0	54	12.13
	8 Unbundled HDSL	0	0	0	0	0	0	0	0	0	0
	9 Unbundled ISDN	2	3	0	0	2	1	3	2	13	28.31
	10 ISDN Retail	0	0	0	0	0	0	0	0	0	0
	12 Unbundled Copper Loop	2	36	9	1	5	1	8	2	67	16.39

Comparison of Retail, Resale and UNE xDSL Activity											
By State, By MSA, by Product											
With Interval Distribution & Average Interval & Count											
(Retail for Business Class ADSL Only - Guaranteed Transmission Levels)											
February 2000											
Dispatch	Interval										
State	Service	0-5	6-10	11-15	16-20	21-25	26-30	31-50	60+	Total	AVG INTVL(DAY)
Georgia	1 NSP Wholesale Mass Market(DOT.NET)	113	784	122	57	51	31	71	16	1245	12.3
	2 NSP Wholesale Mass Market-CLEC(DOT.NET)	0	0	0	0	0	0	0	0	0	0
	3 NSP Wholesale Business(DOT.NET)	0	0	0	0	0	0	0	0	0	0
	4 NSP Wholesale Business-CLEC(DOT.NET)	0	1	0	1	0	0	1	0	3	19.33
	5 NSP Wholesale(NOT DOT.NET)	22	573	57	33	14	8	41	15	763	11.97
	6 NSP Wholesale-CLEC(NOT DOT.NET)	0	9	0	1	0	0	0	0	10	8.3
	7 Unbundled ADSL	4	44	3	2	0	1	1	1	56	10.41
	8 Unbundled HDSL	4	1	0	0	0	0	0	1	6	17.28
	9 Unbundled ISDN	8	5	0	0	0	0	0	2	15	14.13
	10 ISDN Retail	0	0	0	0	0	0	0	0	0	0
	11 ISDN Resale	0	0	0	0	0	0	0	0	0	0
	12 Unbundled Copper Loop	15	92	17	2	3	0	6	1	136	10.44
Dispatch	Interval										
State	Service	0-5	6-10	11-15	16-20	21-25	26-30	31-50	60+	Total	AVG INTVL(DAY)
Georgia	1+2 NSP WHOLESALE MASS MARKET (DOT.NET + CLEC DOT.NET)	113	784	122	57	51	31	71	16	1245	12.3
	5+6 NSP WHOLESALE (DOT.NET + CLEC DOT.NET)	22	562	57	34	14	8	41	15	773	11.92
	7 Unbundled ADSL	4	44	3	2	0	1	1	1	56	10.41
	8 Unbundled HDSL	4	1	0	0	0	0	0	1	6	17.28
	9 Unbundled ISDN	8	5	0	0	0	0	0	2	15	14.13
	10 ISDN Retail	0	0	0	0	0	0	0	0	0	0
	12 Unbundled Copper Loop	15	92	17	2	3	0	6	1	136	10.44